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[Additional Counsel Listed on Signature Page]		
UNITED STATES DISTRICT COURT		
FOR THE NORTHERN DISTRICT OF CALIFORNIA		
SAN FRANCISCO DIVISION		
IN RE: TFT-LCD (FLAT PANEL) ANTITRUST	CASE NOS. 3:11-cv-05781-SI and 3:11-cv-05765 (N.D. Cal)	
	MDL NO. 3:07-md-1827-SI	
This Document Relates to Individual Case Nos. 3:11-cy-05781-SI and 3:11-cy-05765		
(N.D. Cal.)		
THE AASI LIQUIDATING TRUST, BY AND	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO MEET	
THROUGH KENNETH A. WELT, LIQUIDATING TRUSTEE,	AND CONFER AND/OR TO FILE MOTIONS TO COMPEL	
Plaintiff,		
VS.		
AU OPTRONICS CORPORATION, et al.,		
Defendants.		
STIPULATION AND [PROPOSED] ORDER EX	TENDING TIME TO MEET AND CONFER	
	DAVIS WRIGHT TREMAINE LLP 505 Montgomery Street, Suite 800 San Francisco, California 94111 Telephone: (415) 276-6500 Facsimile: (415) 276-6599 Email: allisondavis@dwt.com sanjaynangia@dwt.com NICK VERWOLF (Admitted pro hac vice) DAVIS WRIGHT TREMAINE LLP 777 108 th Avenue NE, Suite 2300 Bellevue, Washington 98004 Telephone: (425) 646-6100 Facsimile: (425) 646-6199 Email: nickverwolf@dwt.com Attorneys for Defendant Sanyo Consumer Electronics Co., Ltd. [Additional Counsel Listed on Signature Page] UNITED STATES DI FOR THE NORTHERN DIST SAN FRANCISC IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION This Document Relates to Individual Case Nos. 3:11-cv-05781-SI and 3:11-cv-05765 (N.D. Cal.) THE AASI LIQUIDATING TRUST, BY AND THROUGH KENNETH A. WELT, LIQUIDATING TRUSTEE, Plaintiff, vs. AU OPTRONICS CORPORATION, et al., Defendants.	

AND/OR FILE MOTIONS TO COMPEL CASE No. 3:11-cv-05781-SI AND 3:11-cv-05765-SI; MDL No. 3:07-MD-01827 SI

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TECH DATA CORPORATION; TECH DATA PRODUCT MANAGEMENT, INC.,
Plaintiffs.

VS.

AU OPTRONICS CORPORATION, et al.,

Defendants.

Plaintiff The AASI Liquidating Trust, by and through Kenneth A. Welt, Liquidating Trustee ("AASI") and Defendants (collectively "Stipulating Defendants"); AASI and defendant Sanyo Consumer Electronics Co., Ltd. ("Sanyo Consumer Electronics"); and plaintiffs Tech Data Corporation and Tech Data Product Management (collectively "Tech Data") and Sanyo Consumer Electronics hereby stipulate as follows:

WHEREAS, Stipulating Defendants served AASI with a Third Request for Production of Documents and Third Set of Interrogatories on March 12, 2013 (collectively, "Defendants' Discovery Requests");

WHEREAS, AASI timely served responses to Defendants' Discovery Requests on or about April 15, 2013;

WHEREAS, Stipulating Defendants sent AASI a meet and confer letter regarding its responses to Defendants' Discovery Requests on May 13, 2013 and the parties have endeavored to meet and confer before the close of discovery;

WHEREAS, Sanyo Consumer Electronics served each of Tech Data and AASI with a First Request for Production of Documents, First Set of Interrogatories and First Set of Requests for Admissions (collectively, Sanyo's Discovery Requests") on February 22, 2013;

WHEREAS, Sanyo Consumer Electronics, Tech Data and AASI agreed to a one-week extension of Tech Data's and AASI's time to respond to Sanyo's Discovery Requests and Tech Data and AASI each subsequently served responses on April 3, 2013;

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1	WHEREAS, Sanyo Consumer Electronics and Tech Data and AASI have exchanged meet
2	and confer letters between May 7, 2013 and May 14, 2013;
3	WHEREAS, Sanyo Consumer Electronics and Tech Data and AASI have discussed via
4	phone the remaining issues regarding Tech Data's and AASI's responses to Sanyo's Discovery
5	Requests on May 16, 2013;
6	WHEREAS, counsel for Sanyo Consumer Electronics and Tech Data and AASI have been
7	conducting multiple depositions the week of May 13, 2013 in the above-captioned case;
8	WHEREAS, fact discovery in the Track 2 Direct Action Plaintiff cases is set to close on
9	May 17, 2013, pursuant to the Stipulation and Order Setting Revised Track 2 Deadlines (Dkt. No.
10	7665, the "Scheduling Order");
11	WHEREAS, under Local Rule 37-3, no motions to compel discovery may be filed more
12	than seven (7) days after the discovery cut-off;
13	WHEREAS additional time is needed to meet and confer regarding AASI's responses to
14	Defendants' Discovery Requests and Tech Data's and AASI's responses to Sanyo's Discovery
15	Requests;
16	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
17	undersigned counsel as follows:
18	The period for Stipulating Defendants and AASI to meet and confer regarding AASI's
19	responses to Defendants' Discovery Requests and/or for Stipulating Defendants to file a motion to
20	compel regarding AASI's responses to Defendants' Discovery Requests is extended to June 10,
21	2013.
22	The period for Sanyo Consumer Electronics, Tech Data and AASI to meet and confer
23	regarding Tech Data's and AASI's responses to Sanyo's Discovery Requests and/or for Sanyo
24	Consumer Electronics to file a motion to compel regarding Tech Data's or AASI's responses to
25	Sanyo's Discovery Requests is extended to June 10, 2013.
26	This extension of the motion to compel deadline as to AASI or Tech Data or any additional
27	information provided by AASI in response to Defendants' Discovery Requests or by Tech Data or
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1	AASI in response to Sanyo's Discovery Requests will not give rise to an extension of either	
2	AASI's or Tech Data's deadline to submit their expert reports, currently set for June 6, 2013 under	
3	the Scheduling Order.	
4	This stipulation does not impact or change the terms or deadline of the stipulation between	
5	Tech Data and Stipulating Defendants, dated May 10, 2013, providing for an extension of time	
6	through July 12, 2013 for the limited purpose of allowing Stipulating Defendants to take	
7	additional depositions of certain Tech Data employees.	
8	Respectfully submitted,	
9	Dated: May 23, 2013 DAVIS WRIGHT TREMAINE LLP	
0		
1	By <u>/s/ Sanjay Nangia</u>	
2	Allison A. Davis Sanjay Nangia	
3	Nick S. Verwolf, Pro Hac Vice	
4	Attorneys for Defendant Sanyo Consumer Electronics Co., Ltd.	
5		
6	Also filed on behalf of Defendants AU Optronics Corporation; AU Optronics Corporation America; Chi Mei	
7	Optoelectronics Corporation (n/k/a Chimei Innolux Corporation); Chi Mei Optoelectronics USA, Inc., and	
8	CMO Japan Co., Ltd.; Chunghwa Picture Tubes, Ltd.; Epson Imaging Devices Corporation; Epson Electronics	
9	America, Inc.; HannStar Display Corporation; Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices	
20	(USA), Inc.; LG Display Co., Ltd.; LG Display America, Inc.; Mitsui & Co. (U.S.A.), Inc.; Mitsui & Co. (Taiwan),	
21	Ltd.; NEC Corporation; NEC Electronics America, Inc.; NEC LCD Technologies, Ltd.; Sanyo Consumer	
22	Electronics Co., Ltd.; Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation; Toshiba	
23	America Electronic Components, Inc.; Toshiba America Information Systems, Inc.; and Toshiba Mobile Display	
24	Co., Ltd.	
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1	DATED: May 23, 2013	BILZIN SUMBERG BAENA PRICE & AXELROD LLP
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3		By: <u>/s/ Scott N. Wagner</u> Robert W. Turken
4		Scott N. Wagner Lori Lustrin
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6		Attorneys for Plaintiffs The AASI Liquidating Trust, by and through Kenneth A.
7		Welt, Liquidating Trustee; Tech Data Corporation and Tech Data Product Management
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1	Pursuant to General Order No. 4 document has been obtained from	5, § X-B, the filer attests that concurrence in the filing of this
2	document has been obtained from	if each of the above signatories.
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1 2	IT IS SO ORDERED.	
3	Dated:05/23/2013	Suran Delaton
4		Hon. Susan Illston United States District Judge
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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO MEET AND CONFER AND/OR TO FILE MOTIONS TO COMPEL

CASE No. 3:11-cv-05781-SI AND 3:11-cv-05765-SI; MDL No. 3:07-MD-01827 SI